

1 WRIGHT, FINLAY & ZAK, LLP
2 Ramir M. Hernandez, Esq.
3 Nevada Bar No. 13146
4 7785 W. Sahara Ave., Suite 200
5 Las Vegas, NV 89117
6 (702) 475-7964; Fax: (702) 946-1345
7 rhernandez@wrightlegal.net

8 *Attorneys for Defendants, DIRECTV, LLC and AT&T Services, Inc.*

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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 TIMOTHY TEXEIRA,

14 Plaintiff,

15 vs.

16 NATIONAL CONSUMER TELECOM &
17 UTILITIES EXCHANGE, INC.; LAC DU
18 FLAMBEAU BAND OF LAKE SUPERIOR
19 CHIPPEWA INDIANS DBA NIIZHWAASWI,
20 LLC DBA LOAN AT LAST, CNU ONLINE
21 HOLDINGS, LLC, ONE MAIN FINANCIAL,
22 DIRECTV, LLC, AT& T CORP DBA AT&T
23 UVERSE, CLARITY SERVICES LLC,
24 BACKGROUNDCHECKS.COM, LLC,

25 Defendants.

Case No.: 2:22-cv-00153-GMN-DJA

26 **JOINT MOTION TO EXTEND**
27 **DEADLINE TO RESPOND TO**
28 **PLAINTIFF’S COMPLAINT (FIRST**
REQUEST)

Plaintiff, Timothy Texeira (“Plaintiff”), and Defendant, DIRECTV, LLC and AT&T Services, Inc. (erroneously sued as “AT&T Corp. dba AT&T uVerse”) (“Defendants”) (collectively “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

On January 27, 2022, Plaintiff filed his Complaint [ECF No. 1]. Defendants were served with Plaintiff’s Complaint on January 31, 2022. The deadline for Defendants to respond to Plaintiff’s Complaint is February 22, 2022. The Parties have discussed extending the deadline for Defendants to respond to Plaintiff’s Complaint to allow for better investigation of the allegations and discuss possible resolution of the matter.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendants

1 to file their responsive pleading to Plaintiff's Complaint to March 21, 2022.

2 This is the first motion for an extension of time for Defendants to file their responsive
3 pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to
4 any other party.

5 As part of this motion, Defendants agree to participate in any Rule 26(f) conference that
6 occurs during the pendency of this extension.

7 DATED this 10th day of February, 2021.

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9 WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

10 /s/ Ramir M. Hernandez

/s/ Gerardo Avalos

11 Ramir M. Hernandez, Esq.

Gerardo Avalos, Esq.

12 Nevada Bar No. 13146

Nevada Bar No. 15171

13 7785 W. Sahara Ave., Suite 200

8985 S. Eastern Ave. Suite 350

14 Las Vegas, NV 89117

Las Vegas, NV 89123

*Attorneys for Defendants, DIRECTV, LLC
and AT&T Services, Inc.*

Attorneys for Plaintiff, Timothy Texeira

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18 IT IS SO ORDERED:

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20 UNITED STATES MAGISTRATE JUDGE

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22 DATED: February 10, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** on the 10th day of February, 2022, to all parties on the CM/ECF service list.

/s/ Lisa Cox

An Employee of WRIGHT, FINLAY & ZAK, LLP